

REMARKS/ARGUMENTS

Claims 1-24 are now pending in this application. Claims 1, 5, 9, 13, 17 and 21 are independent claims.

Claim Rejections – 35 USC § 102(e)

Claims 1-24 were rejected under 35 U.S.C. § 102(e) as being anticipated by Hetzler (US 7,134,139-B2) (hereinafter: Hetzler) (Pending Office Action, Page 3). Applicant respectfully traverse these rejections.

Anticipation requires the disclosure in a single prior art reference of each element of the claim under consideration. *W.L. Gore & Assocs. v. Garlock*, 721 F.2d 1540, 220 USPQ 303 (Fed. Cir. 1983), *cert. denied*, 469 U.S. 851 (1984). Further, “anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim.” *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 730 F.2d 1452, 221 USPQ 481, 485 (Fed. Cir. 1984) (citing *Connell v. Sears, Roebuck & Co.*, 722 F.2d 1542, 220 USPQ 193 (Fed. Cir. 1983)). Emphasis added.

Independent Claims 1, 5, 9, 13, 17, and 21 recite elements that have not been disclosed, taught or suggested by Hetzler. For example, Claims 1, 5, 9, 13, 17 and 21 each generally recite “receiving an iSCSI login request; determining whether a payload of said iSCSI login request contains a “SessionType=Discovery” key/value pair”. The Examiner cites “a login request is received from a requesting client. The request includes a valid client ticket along with (B, LU . . .)” (as taught in Hetzler) as being equivalent to receiving a iSCSI login request (as claimed in the present application). Applicant respectfully disagrees; pointing out that in Hetzler the authentication via the issuance of client tickets is directed to the cache device at the block level in order to access data pre-fetched. In the present application the login request is an iSCSI login request, which operates in target stealth mode. In a discovery session opened on the iSCSI network entity, the **iSCSI network is required to return a list of all targets on the network**

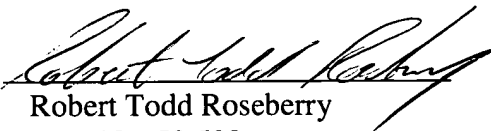
entity and all of the portal groups associated with each target. It is the return of reported information with or without target names which may be used by potential attackers to mount denial of services attacks to the IP addresses on the network entity. The present application provides security to the iSCSI network without compromising standard iSCSI target function. Hetzler fails to disclose the above referenced elements.

Therefore, Applicant points out that under Lindemann, a prima facie case of anticipation has not been established for independent Claims 1, 5, 9, 13, 17, and 21. Thus, based on the above rationale, the rejection under this section against independent Claims 1, 5, 9, 13, 17, and 21 should be withdrawn. Further, Claims 2-4 (which depend from Claim 1), Claims 6-8 (which depend from Claim 5), Claims 10-12 (which depend from Claim 19), Claims 14-17 (which depend from Claim 13), Claims 18-20 (which depend from Claim 17), and Claims 22-24 (which depend from claim 21) should also be allowed.

CONCLUSION

In light of the forgoing, reconsideration and allowance of the pending claims is earnestly solicited.

Respectfully submitted on behalf of
LSI Logic,

By: 
Robert Todd Roseberry
Reg. No. 52,503

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Robert Todd Roseberry
SUITER • SWANTZ PC LLO
14301 FNB Parkway, Suite 220
Omaha, NE 68154
(402) 496-0300 telephone
(402) 496-0333 facsimile